

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT

MOHAMMED PARACHA,	)	
	)	
Plaintiff,	)	
	)	Case No.
vs.	)	
	)	JURY TRIAL DEMANDED
ABDIFATAH ABDULLAHI BARE and	)	
AAA FREIGHT, INC.,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL TO DISTRICT COURT**

Come now Defendants, by and through their attorneys, and request the removal of the above captioned action from the Circuit Court of St. Louis County, State of Missouri, to the United States District Court for the Eastern District of Missouri pursuant to the provisions of U.S.C. Sections 1332 and 1441(a). In support of his request, Defendant states as follows:

1. Plaintiff commenced this action in the Circuit Court of the County of St. Louis, State of Missouri, on or about December 2, 2020 under the caption Mohammed Paracha v. Abdifatah Abdullahi Bare and AAA Freight, Inc., Cause Number 20SL-CC05883.

2. Defendants hereby request the removal of said action to the United States District Court for the Eastern District of Missouri, based upon the existence of diversity of citizenship between Plaintiff and Defendants pursuant to the diversity jurisdiction of this court and 28 U.S.C. Section 1332(a)(1).

3. The United States District Court for the Eastern District of Missouri, is the Federal District Court embracing the Circuit Court of the County of St. Louis, State of Missouri, where this action is currently pending.

4. This is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. Section 1332(a)(1), and is one which may be removed to this Court pursuant to the provisions of 28 U.S.C. Section 1441(a), in that:

a. Plaintiff was a citizen and resident of the State of Missouri at the time of the occurrence described in Plaintiff's Petition, and continues to be and remains a resident of the State of Missouri up to and including the present time.

b. Defendant AAA Freight, Inc. was an Illinois corporation at the time of the occurrence described in Plaintiff's Petition, and continues to be and remains an Illinois corporation up to and including the present time.


c. Defendant Abdifatah Abdullahi Bare was a citizen and resident of the State of Minnesota at the time of the occurrence described in Plaintiff's Petition, and continues to be and remains a citizen and resident of the State of Minnesota up to and including the present time.

d. Plaintiff's Petition seeks recovery of an amount in excess of \$75,000.00, and therefore there is a reasonable probability that the matter in controversy herein exceeds the sum of \$75,000.00 exclusive of interest and costs.

5. This Petition is filed pursuant to the provisions of 28 U.S.C. Sections 1441(a) and 1446 within 30 days after the receipt by Defendants of the initial pleadings setting forth the claim for relief upon which this action is based.

6. There are attached to this notice and incorporated hereby by reference, true and accurate copies of all process, pleadings and orders to date in this action.

WHEREFORE, Defendants request that this case be removed from the Circuit Court of St. Louis County, State of Missouri to the United States District Court for the Eastern District of Missouri.

  
Daniel E. Wilke

STATE OF MISSOURI     )  
                                      )SS  
CITY OF ST. LOUIS     )

Daniel E. Wilke, first being duly sworn upon his oath, states that he is the agent and attorney for Defendant, that he has read the foregoing Removal Petition and knows the contents thereof, and that the statements herein contained are true to the best of his knowledge, information and belief.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal this 31 day of December, 2020.

  
NOTARY PUBLIC

My Commission Expires:



LORI BOISMENUE  
My Commission Expires  
October 18, 2022  
St. Louis County  
Commission #14430315

/s/ Daniel E. Wilke  
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I hereby certify that on December 31, 2020 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Thomas C. Rich  
Kristina D. Cooksey  
Michelle M. Rich  
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ATTORNEYS FOR PLAINTIFF

**/s/ Daniel E. Wilke**

DEW:lb